

## 1. Terms and Definitions

**Personal Data** – any information related to an identified or identifiable individual (subject of personal data). This information may include, but is not limited to, the following data provided by the User: surname, first name, patronymic, phone number, email address, and other information.

**Personal Data Processing** – any action (operation) or set of actions (operations) performed with personal data, using automation tools or not, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, usage, transmission (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data.

**Confidentiality of Personal Data** – a requirement to ensure that personnel authorized to process personal data comply with the rules for their processing and storage, prevent their dissemination without the consent of the subject or other legal grounds, and ensure the necessary conditions for the security of the User's personal data.

**Destruction of Personal Data** – actions that make it impossible to restore the content of personal data in the personal data information system and/or destroy physical carriers of personal data.

**Company** – ANO "National Priorities," a legal entity registered in accordance with the legislation of the Russian Federation, located at: Russia, Moscow, Bolshaya Molchanovka Street, 21A.

**Website** – the website located at <https://discoverrussia.travel>

**Publicly Available Personal Data** – personal data to which an unlimited number of persons have access with the consent of the subject or to which confidentiality requirements do not apply in accordance with applicable legislation.

**Consent to Process Personal Data** – the voluntary, conclusive actions by the User when using the Website and/or submitting a request to the Company, meaning the unconditional consent of the User to the terms of this Policy and the Cookie Usage Policy, as well as consent to the processing of personal data in accordance with these documents.

**User** – a visitor to the Website.

**Cookie File** – a small fragment of data sent by the website's server and stored on the User's device. It is used to save certain data about the User, such as settings and preferences.

## 2. General Provisions

2.1. This Personal Data Processing Policy (hereinafter referred to as the "Policy") is developed in accordance with the provisions of Federal Law No. 152-FL "On Personal Data" of the Russian Federation, other federal laws regulating personal data processing, and sub-legal normative acts of the Russian Federation.

2.2. The purpose of this Policy is to define the procedure for processing and protecting the personal data of Users whose data is subject to processing, ensuring the protection of rights and freedoms during personal data processing, including the protection of privacy, personal and family secrets, and establishing responsibility for the personnel authorized to process personal data for failure to comply with the norms regulating personal data processing and protection.

2.3. This Policy enters into force from the moment it is posted on the Website. The Company has the right to make changes to this Policy at any time by posting the updated version on the Website.

2.4. The Company has the right to update the terms of this Policy. Each time the User visits the Website, they must review the current terms of the Policy. Continuing to use the Website after the new version of the Policy is posted means the User has fully acquainted themselves with the updated Policy terms.

### **3. Data Composition**

3.1. The Company hereby notifies Users that, to improve the convenience of using the Website, cookies and the Yandex.Metrica service are used, which may have access to the User's data in connection with the use of the Website. Detailed information about the use of cookies is provided in the Cookie Usage Policy.

3.2. The Company does not request and does not use the User's personal data to ensure their access to the Website's content.

3.3. The User has the right to contact the Company via email for inquiries.

3.3.1. Personal data provided by the User in connection with their inquiries to the Company (such as clarifying information, questions regarding Website content, requests for personal data processing, etc.) may include:

- surname, first name, patronymic of the User;
- address, email address;
- contact phone number;
- information about the Website visit;
- other data at the discretion of the User.

3.3.2. The fact that the User has sent an inquiry to the Company means the User's express consent to the processing of the personal data provided for the purpose of reviewing the inquiry and providing the requested information.

3.4. The Company does not request or process sensitive categories of personal data of the User, such as data regarding their race, ethnicity, political views, religious or philosophical beliefs, health, private life, and biometric data.

### **4. Purposes of Personal Data Processing**

The purposes of personal data processing are:

- reviewing incoming inquiries of any kind;
- interaction with Users via the Website;
- providing the User with requested information about the Company and the Website;
- sending informational materials to the User in response to their inquiry;
- analyzing User behavior on the Website.

### **5. Principles of Personal Data Processing**

5.1. The Company ensures compliance with the principles of personal data processing established by applicable legislation, including the following:

5.1.1. Personal data processing is carried out lawfully and fairly.

5.1.2. Personal data processing is limited to achieving specific, predetermined, and lawful purposes. Personal data processing incompatible with the purposes for which the data was collected is not carried out.

5.1.3. Only personal data necessary to achieve the purposes of their processing are processed.

5.1.4. The content and scope of personal data being processed are consistent with the stated purposes. The personal data processed is not excessive in relation to the stated purposes.

5.1.5. The accuracy, adequacy, and relevance of personal data to the purposes of processing are ensured. The Company takes necessary measures to remove or correct incomplete or inaccurate personal data.

5.1.6. Personal data is stored in a form that allows the identification of the data subject and for no longer than is necessary for the purposes of processing, unless a different retention period is provided by federal law, contract, or other legal grounds. Processed personal data is destroyed or anonymized once the processing goals are achieved or when the need for processing ceases, unless otherwise provided by legislation.

5.1.7. The Company does not process personal data without the prior consent of the data subject for the purpose of promoting goods, works, or services in the market, or for political agitation.

## **6. Collection of Personal Data**

6.1. The procedure for obtaining (collecting) personal data:

6.1.1. The User voluntarily provides all personal data in electronic form or on paper (copies) when complying with the Company's requirements, as set forth in relevant agreements to which the User may be a party.

6.1.2. The User's consent to process their personal data is stored in electronic form.

6.1.3. The User's consent to the processing of personal data for the purposes outlined in Section 4 of this Policy remains valid until the objectives of the data processing are achieved or until the User withdraws their consent.

## **7. Personal Data Processing Procedure**

7.1. The User (data subject) provides the Company with accurate information about themselves.

7.2. Only authorized employees of the Company, who have signed a confidentiality agreement, are allowed access to the personal data of Users.

7.3. The Company does not disclose or distribute personal data to third parties without the consent of the data subject, except as required by Federal Law No. 152-FL "On Personal Data."

7.4. Employees who have access to personal data process them according to internal policies. These employees have been trained on how to handle User personal data.

7.5. The processing of personal data is carried out exclusively for the purposes set out in this Policy and in compliance with applicable legislation.

7.6. The Company applies organizational and technical measures to ensure the security of personal data in accordance with Federal Law No. 152-FL "On Personal Data."

7.7. Personal data is primarily stored on electronic media and processed using automated systems, except where non-automated processing is necessary to comply with legal requirements. The personal data of Users is stored on the Company's servers located in the Russian Federation.

7.8. Personal data is stored for no longer than is necessary for the purposes of processing, unless otherwise provided by Russian law.

7.9. The Company may entrust the processing of personal data to a third party with the consent of the data subject, based on an agreement. Third parties involved in personal data processing must handle the data in a minimal necessary scope and exclusively for the purposes set out in this Policy.

7.10. The Company destroys personal data when its processing is terminated in the following cases:

- achievement of the objectives of personal data processing;
- inability to ensure the legality of personal data processing in the event of unlawful processing being identified based on a request from the data subject (or their representative) or the authorized body for the protection of personal data subjects' rights;
- withdrawal of the data subject's consent to process their personal data (if the retention of the personal data is no longer required for the purposes of personal data processing);
- a request from the data subject to cease the processing of their personal data;
- submission by the data subject or their representative of information confirming that the personal data is illegally obtained or is unnecessary for the stated processing purpose;
- receipt of a corresponding order from the authorized body for the protection of personal data subjects' rights;
- other cases provided for by the legislation of the Russian Federation and within the timeframes established by Russian Federation law.

## **8. Protection of Personal Data**

8.1. The protection of the User's personal data refers to a set of measures (organizational, managerial, technical) aimed at preventing unauthorized or accidental access to personal data, its destruction, modification, blocking, copying, distribution, or any other illegal actions.

8.2. The protection of the User's personal data is carried out by the Company according to the

procedures established by Russian Federation legislation.

8.3. The Company, when protecting the User's personal data, takes all necessary organizational and technical measures, including:

- antivirus protection;
- auditing (monitoring) of security/vulnerability;
- access control to the network, management of the local network, monitoring of the Company's premises where personal data of Users are stored, division of access rights of employees using accounts;
- registration and accounting;
- ensuring the storage of information containing personal data of Users, excluding access to third parties;
- general monitoring of employees' compliance with the personal data protection measures;
- protection of personal data of Users stored in the Company's electronic databases from unauthorized access, distortion, transmission, destruction, and other unlawful actions;
- data transfer through secure communication channels. Information system interfaces are secured via the HTTPS protocol with end-data encryption certificates used during data transmission between the storage server and workstations. Anonymized forms containing only IP addresses and other technical attributes of the provided services are used for data transmission to equipment.
- personnel directly involved in the processing of personal data are familiarized with the provisions of Russian Federation personal data legislation, including requirements for personal data protection, documents defining the policy regarding personal data processing, and internal acts on personal data processing;

an individual responsible for organizing the processing of personal data has been appointed;

- threat models for the security of personal data in information systems are developed;
- accounting of machine carriers of personal data is ensured;
- the possibility of restoring personal data modified or destroyed due to unauthorized access is provided;
- access rules to personal data processed in the personal data information system are developed, and all actions performed with personal data in the information system are recorded and accounted for.
- internal control of the compliance of personal data processing with the requirements of Federal Law No. 152-FL "On Personal Data" and related regulatory acts, personal data protection requirements, this Policy, and the Company's internal regulations is carried out by the individual responsible for organizing personal data processing in the Company;
- the possibility of uncontrolled penetration or presence of unauthorized individuals in the premises where personal data is processed is excluded;
- the safety of personal data carriers and data protection means is ensured.
- to ensure the security of personal data, software and technical tools that have passed the required compliance assessment procedure are used.

8.4. Responses to written requests from other organizations and institutions regarding the personal data of Users are provided only with the written consent of the User, unless otherwise specified by Russian Federation legislation.

## **9. User Rights**

9.1. The rights of personal data subjects are defined by the applicable laws of the Russian Federation and other applicable legislation, and include the right to:

- receive information about their personal data processed by the Company;
- access their personal data processed by the Company, including the right to obtain a copy of any record containing their personal data, unless otherwise specified by legislation;
- clarify, block, or destroy personal data processed by the Company if the personal data is incomplete, outdated, inaccurate, illegally obtained, or unnecessary for the declared processing purpose;
- withdraw their consent given to the Company for the processing of personal data;
- take legal measures to protect their rights as provided by law;
- appeal against actions or omissions of the Company that violate Russian Federation legislation on personal data to the authority responsible for protecting personal data subjects'

rights or to the court;

- send a request to the Company to stop the transfer (distribution, provision, access) of their personal data, the dissemination of which was previously authorized by the personal data subject;

- exercise other rights provided by applicable legislation.

9.2. Requests for information about personal data processing, as well as requests for clarification, modification, or cessation of personal data processing and the withdrawal of consent to process personal data, should be sent in writing to the Company's address: Russian Federation, 121069, Moscow, Bolshaya Molchanovka Street, 21A.

## **10. Liability for Violation of Personal Data Processing and Protection Norms**

10.1. Individuals who are responsible for violating the norms regulating the collection, processing, and protection of personal data will bear disciplinary, administrative, civil, or criminal responsibility in accordance with the applicable laws of the Russian Federation and the Company's internal regulations.

10.2. Internal control of compliance with personal data processing requirements, including the requirements of Federal Law No. 152-FL "On Personal Data" and related regulatory acts, the requirements for personal data protection, this Policy, and the Company's internal regulations, is carried out by the individual responsible for organizing personal data processing in the Company, according to the internal regulations set by the Company on personal data.